Chetco Bar Fire Salvage Project
Issue Statements

Issues

Based on scoping, issues were compiled into three classifications: Relevant issues, analysis issues (including analysis issues addressed by project design criteria) and issues outside the scope of the project.

Relevant Issues

Relevant issues act to evaluate alternatives, affect the design of component proposals, prescribe mitigation measures, and/or describe important and variable environmental effects. They are relevant because of the extent of their geographic consequence, the duration of the effects, or the intensity of interest or resource conflict. Relevant issues also act to determine the appropriate depth of the environmental analysis of the Proposed Action and identify potentially associated environmental effects.

The following are Relevant Issues:

Effects to Early Seral Habitat and Biological Legacies (snags and downed wood)

Numerous comment letters urged the Forest Service to limit salvage harvesting to existing plantations (managed stands).

> ***Cause/Effect Relationship:*** Salvage logging within unmanaged stands may affect the early seral habitat with biological legacies (large snags and downed wood) that these areas could provide if left unmanaged.
>
> ***Possible Alternative:*** Develop an alternative that does not salvage within unmanaged stands (Alternative 3).
>
> ***Proposed Resolution:*** Proposed Action will include salvage treatments in unmanaged stands and develop Alternative 3 that does not salvage in unmanaged stands.
>
> ***Indicator for Analysis:*** Acres of treatments within unmanaged stands, acres of early seral habitat with biological legacies.
>
> ***Analysis Notes:*** There are many acres of high severity fire that will not be salvaged that can provide some level of complex, early seral habitat with biological legacies. Riparian reserves (including unstable slopes) and LSR will provide a network of untreated lands that will also provide early seral habitat with biological legacies. Additionally, there are many acres in matrix that burned at 0-49% basal area loss that will also provide some level of early seral with biological legacies. NWFP has guidelines for downed wood and snags in the matrix. Snag retention levels will be based on forest plan standards, NWFP standards, most recent science, and DecAID.
>
> Unmanaged stands are in the Matrix, and the management objectives of matrix points to the need of harvesting timber; subsequently, it is important to salvage timber and reset the timber production for future harvest opportunities. Under the Proposed Action, this timber would be harvested, capturing the economic value that was intended to be sustainably and evenly harvested over time.

Analysis Issues

Analysis issues are defined as those directly or indirectly caused by implementing the proposed action and they illustrate the tradeoffs between alternatives.

Threatened and Endangered Wildlife Species: Northern Spotted Owl (NSO) and Marbled Murrelet (MAMU): Salvage logging and other connected actions may directly or indirectly affect threatened or endangered terrestrial wildlife species (including the northern spotted owl, and marbled murrelet) by modifying or removing habitat, and disturbance during breeding season.

Economics: Salvage logging and other connected actions may have varying levels of associated economic costs and benefits. The purpose of the Chetco Bar Fire Salvage project is to capture timber value in the matrix land allocations by harvesting dead, dying and/or damaged trees resulting from the 2017 Chetco Bar fire. Alternative 3 would have reduced economic benefit because of a reduction in acres. There is a need to harvest dead and/or dying timber and reforest in a manner that meets objectives of the Siskiyou National Forest Land and Resource Management Plan (LRMP), as amended by the Northwest Forest Plan.

> ***Analysis Notes:*** The purpose and need in the Northwest Forest Plan states that the Forests covered under this Plan are to maintain a sustainable supply of timber and other forest products that will help maintain the stability of local and regional economies on a predictable and long-term basis (Northwest Forest Plan 1-4). The standards and guidelines for the Northwest Forest Plan provide for the majority of timber harvest and other silvicultural activities to be conducted in portions of matrix with suitable forest lands. Most scheduled timber harvest takes place in the matrix (Record of Decision for the Northwest Forest Plan C-39).
>
> FSM 1970 provides policy and principles for conducting economic evaluation of projects in the Forest Service. 1970.6 states *"The responsible line officer determines the scope, appropriate level, and complexity of economic and social evaluations to meet overall objectives and policy (FSM 1970.2 and 1970.3). The scope and depth of analyses depend on the potential social and economic effects of the plan, project or program under review. In many planning and management situations, applicable laws and regulations or Forest Service policy specify analysis requirements. The cost and availability of social and economic data may be considered when determining scope."* The effects to other pertinent natural resources will be described in the EA, Chapter 3.

Undeveloped Areas: Salvage logging and other connected actions (temporary roads) within areas identified has having undeveloped character may make these areas no longer considered undeveloped lands. Areas with undeveloped character include acres of land that have no history of harvest activity and do not contain forest roads and are not areas with wilderness potential, inventoried roadless areas, or a designated wilderness area.

> ***Analysis Notes:*** This analysis issue is closely tied to the relevant issue of early seral habitat with biological legacies. Alternative 3 will also address this issue.

"Analysis Issues" Addressed through Design Criteria

National Wild and Scenic Chetco River: Salvage treatments and other connected actions within the Chetco Wild and Scenic River corridor may affect visual quality objectives and must

comply with the National Wild and Scenic Rivers Act to protect remarkable values, including water clarity, a world class fishery, and outstanding recreational opportunities.

> ***Analysis Notes:*** Because there are no activities (except haul) within the Wild and Scenic River corridor there would be no measurable effect to outstandingly remarkable values (ORV) of recreation, fisheries, and water (quality and quantity). Project design criteria would be developed to avoid and/or minimize effects to desired Recreation Opportunity Spectrum (ROS) levels in the Chetco corridor and across the project footprint.

Steep/Unstable Slopes: Salvage treatments on steep and unstable slopes and other connected actions may affect water quality via erosion and resultant sediment delivery to streams.

> ***Analysis Notes:*** PDCs and road treatments will help mitigate this issue. Not treating unstable slopes, and no ground based logging on steep slopes (> 30%). Ground verification will occur during the timber layout process.

Scenic Quality: Salvage treatments and other connected actions may affect the resulting visual character (evidence of management) and/or attainment of visual quality objectives for scenic quality.

> ***Analysis Notes:*** No project activities except haul would occur in land allocations having a 'retention' VQO. Most treatments (2,920 acres) would be within the General Forest land allocation (MA14), which has a VQO of Modification: management activities may visually dominate the characteristic landscape provided that they mimic naturally established form, line, color, texture, and scale to the extent that they maintain visual compatibility with the natural surroundings. The remainder of treatment units (1,140 acres) would be within the 'Partial Retention Visual' land allocation (MA13), which requires management activities to remain visually subordinate to the characteristic natural landscape. Project design criteria, applied generally to the entire project footprint and specifically to MA13 units as seen in identified foreground, middleground, and background views, would ensure that VQOs would be met or exceeded across the project footprint.

Non-Native Plant Species: Salvage treatments and other connected actions may introduce or encourage exotic (non-native) and undesirable (noxious) plant species, or affect existing populations.

> ***Analysis Notes:*** PDCs will address this issue.

Aquatic Habitat and Fish: Salvage treatments and other connected actions may affect aquatic species and habitats, including Threatened, Endangered, (including Coho salmon) or Sensitive species and/or Essential Fish Habitat.

> ***Analysis Notes:*** The proposed action would have a "no effect" call to fish and will be due to design criteria such as road PDCs, no salvage harvest in riparian reserves, and no ground based salvage logging on slopes >30%.

Disturbance Regime/Hydrologic Function: Salvage treatments and other connected actions may affect hydrologic conditions within the Project Area, including channel morphology, runoff, stream flow, temperature, quantity and quality of water sources, and peak flows.

> ***Analysis Notes:*** Addressed in hydrology and soils reports. PDCs limit effects. 303d streams (Chetco) would be addressed in hydrology report.

Terrestrial Wildlife: Salvage treatments and other connected actions may affect terrestrial wildlife species and habitats, including, Management Indicator Species, NW and local Forest Plan species, Forest Service Sensitive species, Survey and Manage species, and other rare or uncommon species (including neo-tropical migratory birds).

> ***Analysis Notes:*** Wildlife T&E addressed above in Analysis Issues. Effects to terrestrial wildlife will be addressed in the EA.

Soil and Site Productivity: Salvage treatments and other connected actions may alter soil characteristics through compaction, erosion, and structural modification and/or removal of coarse organic matter.

> ***Analysis Notes:*** PDCs have been developed to address this issue.

Heritage (Cultural) Resources: Salvage treatments and other connected actions may affect archaeological or historical sites and/or current Native American values. This was not brought up in scoping but it is an internal issue.

> ***Analysis Notes:*** PDCs have been developed to address this issue, flag, avoid and monitor.

Possible Encroachment into Kalmiopsis Wilderness: Salvage logging units adjacent to the wilderness boundary have the potential to encroach into the wilderness. The Wilderness boundary should be surveyed and clearly marked in advance of salvage treatments.

> ***Analysis Notes:*** A lands request to have portions of the Wilderness, wild and scenic, and IRA boundaries surveyed has been addressed. Wilderness is not an issue because there is a road along most of the boundary. There are no proposed treatments near the portions of boundary with no road.

Sudden Oak Death (SOD): Salvage treatments and other connected actions may spread the disease that affects oaks.

> ***Analysis Notes:*** PDCs have been developed to address this issue. There is also an emergency response procedure for SOD in case we discover new infections and will cite in the analysis.

Port-Orford Cedar (POC): Salvage treatments and other connected actions may spread the root disease that affects Port-Orford cedar.

> ***Analysis Notes:*** PDCs have been developed to address this issue. A risk key has been developed to address this issue. Seed sources are also chosen with climate change in mind.

Climate Change, Greenhouse Gas Emissions and Carbon Sequestration: Climate change may have an effect on seed stock selection for reforestation, and potential changes in natural regeneration. Salvage treatments may influence carbon dioxide sequestration and greenhouse gas emissions.

> ***Analysis Notes:*** This will be addressed in the EA. No measurable difference between alternatives.

Cumulative Watershed Effects: Salvage treatments and other connected actions, in combination with past, other current (including private land salvaging), and reasonably

foreseeable future actions, may result in adverse cumulative watershed effects to hydrologic function and water quality.

Analysis Notes: PDCs have been developed to address this issue.

Aquatic Conservation Strategy: Salvage treatments and other connected actions may affect attainment of the Aquatic Conservation Strategy (ACS).

Analysis Notes: ACS analysis will be included in the project record.

Future High Severity Fires: Salvage treatments may create stands that have high fuel levels and future high fire risk.

Analysis Notes: This will be addressed in the EA. No measurable difference in effects between alternatives.

RAVG Model: Concern regarding the RAVG (Rapid Assessment of Vegetation Condition after Wildfire) model in that it may overestimate high severity fire effects. They suggested we should use MTBS instead because it is more accurate.

Analysis Notes: The Rapid Assessment of Vegetation Condition after Wildfire **(RAVG)** program produces data describing post-fire vegetation conditions on National Forest System (NFS) lands which is used to assess and prioritize post-fire vegetation management. RAVG uses the Relative Differenced Normalized Burn Ratio (RdNBR), which is derived directly from the dNBR, but is considered more sensitive to vegetation mortality than the dNBR. RAVG is considered an initial assessment, which describes initial vegetation mortality (typically 30 days post-fire containment), but does not capture delayed vegetation mortality.

Monitoring Trends in Burn Severity **(MTBS)** is a multi-year project designed to map consistently the burn severity and perimeters of fires across all lands of the United States between 1984 and present. The data generated by MTBS will be used to identify national trends in burn severity, providing information necessary to monitor the effectiveness and effects of the National Fire Plan and Healthy Forests Restoration Act. MTBS maps burn severity using the dNBR; however, the RdNBR is used to adjust burn severity thresholds to better describe post-fire effects to vegetation. MTBS is considered an extended assessment because most fires are mapped using images acquired one-year post-fire (at peak of greenness). This provides the ability to capture delayed vegetation mortality during the mapping process.

The results of RAVG were ground verified in all units.

Estimating Fire Mortality: Concern regarding the agencies failure to acknowledge or disclose the degree of confidence in their estimate-s (i.e. how many false positive predictions of imminent death will the agency make) and failure to recognize the huge importance of remaining live trees.

Analysis Notes: This will be addressed in the EA. No measurable difference in effects between alternatives. The Forest worked with a local entomologist to apply guidelines

from the *Marking guidelines for fire-injured trees in California* (Smith & Cluck. 2011)[1] for predicting mortality of fire-injured trees.

Issues Considered Outside the Scope

Issues outside the scope of the project include points of discussion that are not relevant to the Proposed Action, including those that cannot be addressed with a project level analysis, issues already decided by law, regulation, or other higher level decisions, and issues received from the public that were found to be conjectural or non-substantive.

- Concerns regarding ultra-mafic rocks and the potential public safety risk.
  - *There are no known areas with ultra-mafic rocks in the project footprint*
- Focus post-fire logging on providing strategic fuel breaks to private property
  - *The purpose of the Chetco Bar fire salvage project is to capture timber value in the matrix land allocations by harvesting dead, dying and/or damaged trees resulting from the 2017 Chetco Bar fire. Many of the areas identified for salvage on National Forest System (NFS) lands are adjacent to private property. The Forest Service has no authority to provide strategic fuel breaks on private lands. The EA, Chapter 3 will address the effects of the project to fire and fuels. However, providing strategic fuel breaks is not the purpose of this project and is therefore considered outside the scope of the project.*
- The safety of citizens of Brookings and Harbor is being ignored. Fuel reduction is needed.
  - *The purpose of the Chetco Bar fire salvage project is to capture timber value in the matrix land allocations by harvesting dead, dying and/or damaged trees resulting from the 2017 Chetco Bar fire. Many of the areas identified for salvage on National Forest System (NFS) lands are adjacent to private property. The Forest Service has no authority to address fuel reduction on private lands. The EA, Chapter 3 will address the effects of the project to fire and fuels. However, fuels reduction is not the purpose of this project and is therefore considered outside the scope of the project.*
- Permit woodcutters to remove fire killed trees
  - *Administrative decisions regarding woodcutting is outside the scope of the project.*
- Reclassify previously designated old growth or species dependent areas to matrix as the habitat no longer exists
  - *Revising the Northwest Forest Plan is outside the scope of the project.*
- Reclassify the owl so that it does not impede future forest management to include harvest & salvage on our national forests
  - *Reclassification of the Northern Spotted Owl is outside the scope of the project.*
- Fire suppression strategies for the 2017 Chetco Bar Fire

[1] (Smith, S.L. and D.R. Cluck. 2011) Marking guidelines for fire-injured trees in CA. USDA Forest Service, Region 5, Forest Heath Protection. Report # RO-11-01. 11 p. (available on the internet for Region 5 Forest Health Protection)

        - *Revisiting the fire suppression strategies that occurred during the summer of 2017 is outside the scope of the project.*
    - Revise the 2001 Roadless Rule
        - *Revising the 2001 Roadless Rule is outside the scope of the project.*
    - Ecological Integrity: An alternative that addresses ecological integrity was proposed. FSH 1909.12 – Land management Planning Handbook – Chap. 10 – Assessments (New Planning Rule).
        - *FSH 1909.12 applies at Forest Plan level NEPA, not project level NEPA. Additionally, the purpose of the Chetco Bar fire salvage project is to capture timber value in the matrix land allocations by harvesting dead, dying and/or damaged trees resulting from the 2017 Chetco Bar fire. The EA, Chapter 3 will address the effects of the project to terrestrial and aquatic resources. Post-salvage reforestation will be addressed in this project. Other restoration type projects may be identified in the future.*